

FILED**12/27/2023**THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ASHANTI E. RICKETTS

CASE NUMBER: 1:23-cr-00658

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about December 26, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

Code Section

Title 18, United States Code, Section 2113(a)

Offense Description

by intimidation, took from the person and presence of a bank employee, United States currency belonging to and in the care, custody, control, management, and possession of Byline Bank, located at 6945 N. Clark Street, Chicago, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

This criminal complaint is based upon these facts:

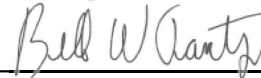
X Continued on the attached sheet.



PAUL PERAINO

Task Force Officer, Federal Bureau of Investigation (FBI)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: December 27, 2023


Judge's signature

City and state: Chicago, IllinoisBETH W. JANTZ, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, PAUL PERAINO, being duly sworn, state as follows:

1. I am a Task Force Officer with the Federal Bureau of Investigation (FBI) and have been so employed since approximately March 2017. I am currently assigned to the FBI's violent crimes task force, and my responsibilities include the investigation of violent crimes, including bank robbery, kidnapping, violations of the Hobbes Act, federal carjacking violations, federal firearms violations, and the apprehension of violent fugitives.

2. I am also a detective with the Chicago Police Department and have been employed with CPD since approximately December of 2000. Before that, I was a police officer with the Illinois State Police for roughly two years.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents who have knowledge of the events and circumstances described herein, law enforcement records, interviews of witnesses, my review of surveillance video, my training and experience, and the training and experience of other law enforcement agents.

I. FACTS SUPPORTING PROBABLE CAUSE

4. In summary, and as set forth in more detail below, on December 26, 2023, a man used a demand note to rob a Byline Bank located at 6945 North Clark Street in Chicago, Illinois ("the Clark Street Byline Bank"). A bank teller at the Clark

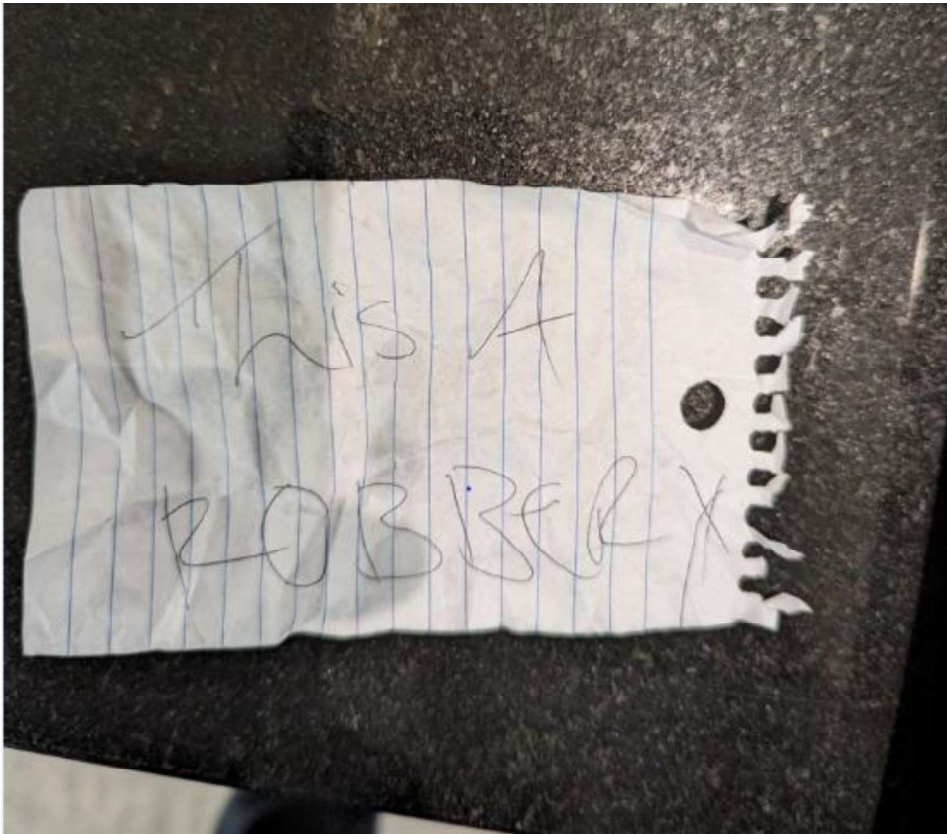
Street Byline Bank complied with the demand note and provided the individual approximately \$671 in cash. The cash was equipped with a GPS tracking device that was activated shortly after the man left the bank on foot at approximately 3:27 p.m.. At approximately 3:30 p.m., a Clark Street Byline Bank employee called law enforcement with a description of the bank robbery. Based on the speed of the tracker movement, law enforcement determined that the bank robber was now fleeing on a bicycle. Approximately 10 minutes after the bank robbery, law enforcement following the path of the GPS tracker observed an individual (subsequently identified as RICKETTS) matching the general description of the bank robber, riding a bicycle near the intersection of Wayne and Farewell (approximately 0.5 miles from the Clark Street Byline Bank). After a brief foot chase, law enforcement apprehended RICKETTS and found \$711 in cash and the GPS tracking device in RICKETTS's front left pant pocket. The shoes and jeans worn by RICKETTS at the time of his arrest matched the general appearance of the shoes and jeans worn by the robber depicted in the Clark Street Byline Bank's video surveillance footage.

a. December 26, 2023, 3:27 p.m.: Robbery of the Clark Street Byline Bank.

5. On December 26, 2023, law enforcement responded to a report of a robbery at the Clark Street Byline Bank and interviewed employees who worked at the Clark Street Byline Bank.

6. According to Teller A (an employee at the Clark Street Byline Bank) and video surveillance footage, on December 26, 2023, at approximately 3:25 p.m., a tall black male entered wearing a mask, and a black jacket with the hood on. At

approximately 3:26 p.m., the man handed Teller A a written note that stated, “This a robbery.” I retrieved a photograph of the demand note. This photograph is reproduced below.

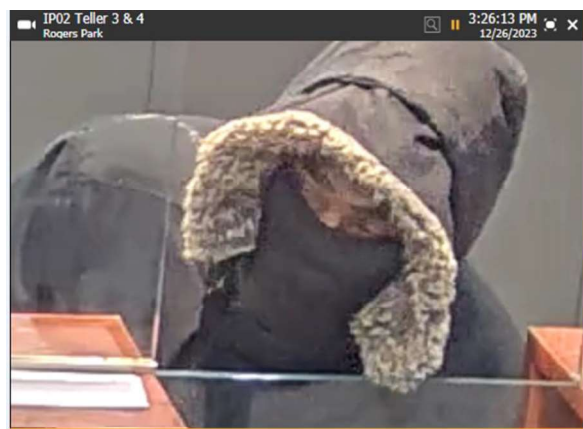
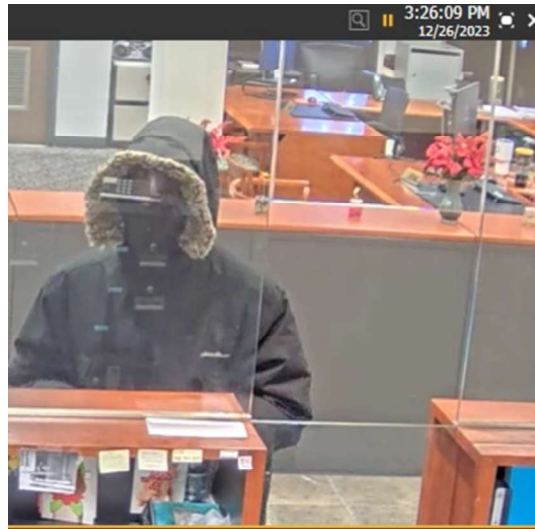


7. According to Teller A, the individual also spoke words to the effect of “this is a robbery,” and told Teller A to “hurry up.”

8. According to Teller A, he gave the individual cash that contained a GPS tracking device (the “GPS Tracking Device”). According to video surveillance footage, at approximately 3:27, the individual left the Clark Street Byline Bank on foot and fled. The GPS Tracking Device was activated shortly thereafter.

9. As a part of this investigation, I viewed still images from the video surveillance at the Clark Street Byline Bank from the date and time of the robbery.

Those still images depict an individual who appears to be a black male, and who was wearing a mask, black jacket with the hood over his head, jeans, and white and beige colored shoes, entering the bank at approximately 3:25 p.m. Some of these images have been reproduced below:



10. According to Assistant Manager A of the Clark Street Byline Bank, he was also a witness to the robbery. At approximately 3:30 p.m., Assistant Manager A called 911 to report a robbery, describing the suspect as a tall, black male with a face mask and a black jacket.

11. An audit of the North Clark Byline Bank determined that Teller A had provided the bank robber with approximately \$671 in cash.

12. According to information available from the Federal Deposit Insurance Corporation, Clark Street Byline Bank's deposits were insured by the Federal Deposit Insurance Corporation at the time of the bank robbery.

b. Tracking of GPS Device, Arrest of RICKETTS and Recovery of GPS Tracking Device.

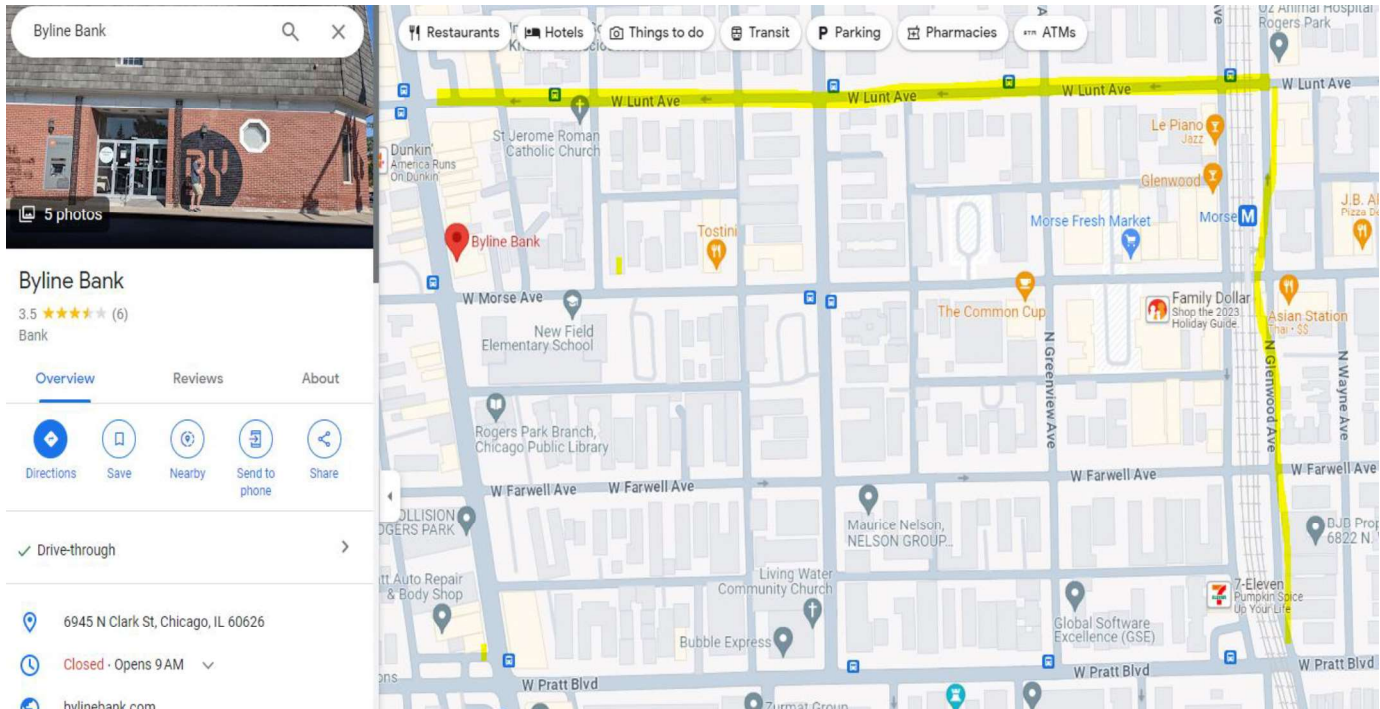
13. According to Chicago Police Department ("CPD") Officer Dixon, at approximately 3:30 p.m. he heard over radio dispatch that a black male wearing a black jacket was a suspect in a bank robbery.

14. According to CPD Officer Dixon, within minutes thereafter, the Strategic Decision Support Center within the 24th District called his partner (CPD Officer Mengeling (collectively the "CPD Arresting Officers")) with information regarding the GPS Tracking Device.

15. On or around 3:30 p.m., I and other FBI agents received a text alert that notified law enforcement that a GPS tracking device has been activated. This alert provided identifying information related to the device's originating bank, including the name of the bank, its address, and phone number.

16. Shortly after 3:30 p.m., FBI agents communicated with the CPD Arresting Officers via radio and provided them with information regarding the location of the GPS Tracking Device, including the fact that the GPS Tracking Device was generally moving east on Lunt Avenue and then south on Glenwood Avenue.

Those streets, in relation to the Clark Street Byline Bank, are highlighted in the following screenshot taken from Google Maps.

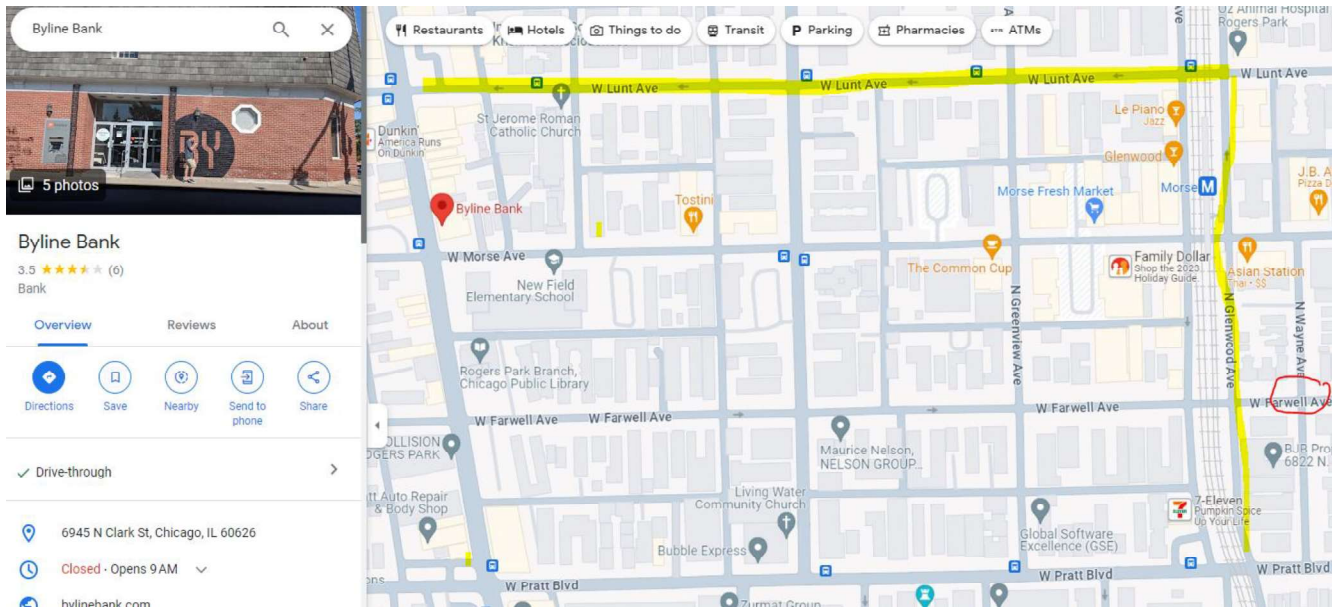


17. According to CPD Officer Dixon, at approximately 3:35 p.m., an FBI agent told the Arresting CPD Officers that based on the speed of the movements being registered by the GPS tracking device, it appeared that the tracking device was in the possession of someone travelling on a bicycle.

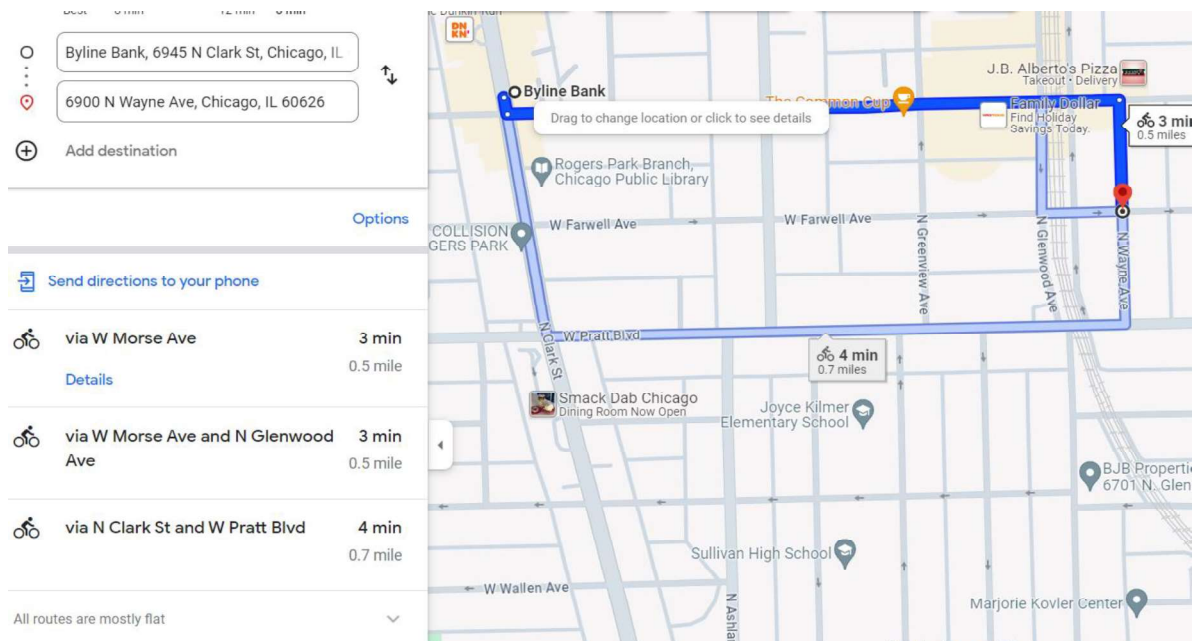
18. At some time between 3:35 p.m. and 3:38 p.m., the CPD Arresting Officers observed a tall, black male (subsequently identified as RICKETTS) riding a bicycle near the intersection of Wayne and Farwell. RICKETTS was not wearing a black jacket or mask at this time.

19. The intersection of Wayne and Farwell is circled in red in the following screenshot taken from Google Maps. This screenshot also depicts the intersection of

Wayne and Farwell location in relation to the Clark Street Byline Bank, Lunt Avenue, and Glenwood Avenue.



21. According to Google Maps, the intersection of Wayne and Farewell is about .5 miles, approximately a three-minute bicycle ride, from the Clark Street Byline Bank.

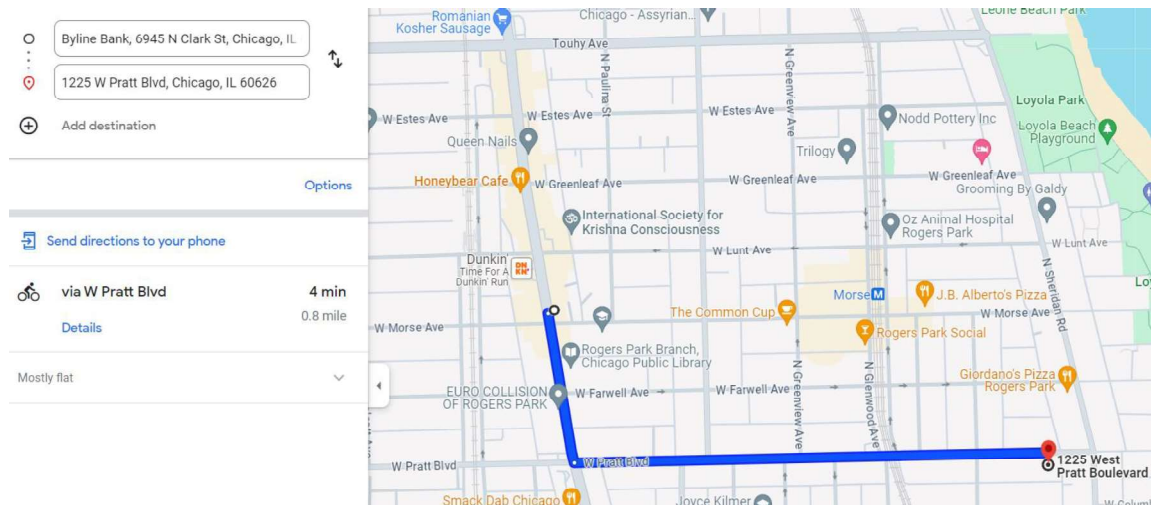


22. Based on my knowledge and experience, it takes usually no longer than 4 to 5 seconds to register the location provided by GPS tracking devices like the one we were monitoring in connection with this robbery.

23. According to CPD Officer Dixon, he and CPD Officer Mengeling approached RICKETTS. As the CPD Arresting Officers approached, they told RICKETTS to stop. RICKETTS instead fled on the bicycle and hit a speed bump in or around an alleyway near 1225 W. Pratt Boulevard. RICKETTS fell off the bicycle and hit the ground, sustaining injuries. The CPD Arresting Officers apprehended RICKETTS in the alleyway at approximately 3:38 p.m.

24. According to CPD Arresting Officers, they recovered \$711 in cash and the GPS tracking device from RICKETTS's front left pant pocket. They also recovered RICKETTS's State I.D. card from RICKETT's person, which identified him as "Ashanti E. Ricketts". The arresting CPD Arresting Officers also recognized RICKETTS from prior arrests.

25. According to Google Maps, 1225 W. Pratt Boulevard is about .8 miles, approximately a four-minute bicycle ride, away from the Clark Street Byline Bank.



26. According to CPD Officer Dixon, Assistant Manager A arrived near 1225 W. Pratt Boulevard to confirm whether he could identify RICKETTS as the same individual who had robbed the Clark Street Byline Bank. Assistant Manager A did not reach a conclusion as to whether RICKETTS was the same individual who had robbed the Clark Street Byline Bank.

27. According to CPD, RICKETTS was transported to Swedish Covenant Hospital to receive treatment for injuries he sustained by falling from his bicycle earlier in the day.

28. While RICKETTS was receiving treatment at Swedish Covenant Hospital, I read RICKETTS his *Miranda* rights and conducted an interview with another CPD Officer present. During this interview, RICKETTS denied robbing the Clark Street Byline Bank earlier in the day.

29. Before I interviewed RICKETTS, law enforcement took a photograph of the shoes and jeans that RICKETTS was wearing, after his arrest. This photograph

is reproduced below, alongside an image of the shoes and jeans worn by the bank robber.



30. Based on my review, the shoes and jeans worn by RICKETTS depicted in this photograph are consistent with the appearance of the shoes and jeans worn by the bank robber. Specifically, both shoes have a beige colored toe and a splatter design located above the toe.

II. CONCLUSION

31. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that, on or about December 26, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, ASHANTI E. RICKETTS, by intimidation, did take from the person or presence of a bank employee, United States currency belonging to and in the care, custody, control, management, and possession of Byline Bank at 6459 N. Clark Street in Chicago, Illinois, the deposits of which were insured

by the Federal Deposit Corporation, in violation of Title 18, United States Code, Section 2113(a).

FURTHER AFFIANT SAYETH NOT.

Paul R. Peraino

PAUL PERAINO

Task Force Officer, Federal Bureau of
Investigation

SWORN TO AND AFFIRMED by telephone December 27, 2023.

Honorable BETH W. JANTZ
United States Magistrate Judge